



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

1011 North Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

EXPLANATION OF SIGNIFICANT DIFFERENCES

Introduction:

Project Title: Proposed Central Los Angeles Middle School #1 Removal Action Workplan

Project Location: Southeast corner of Wilshire Boulevard and Union Avenue,
Los Angeles, Los Angeles County

Lead agency: Department of Toxic Substances Control

Support agency: Los Angeles Unified School District

Per CERCLA section 117(c) and NCP section 300.435(c)(2)(i) an Explanation of Significant Differences (ESD) has been prepared due to a significant change in implementation of the Project.

Summary of Site History, Contamination, Selected Remedy:

The Los Angeles Unified School District (LAUSD), proposed Central Los Angeles Middle School #1 (site) is approximately 8.2 acres. The site was developed as an office building, a gasoline service station, residential and vacant lots, a parking lot, a recycling yard, and an automotive repair and body shop until demolition in 2004. The Preliminary Environmental Assessment (PEA) conducted in 2002 found high levels of lead and arsenic in soil at multiple locations, and underground storage tanks (USTs) at the former service station with associated elevated levels of volatile organic compounds (i.e. MtBE, PCE, and benzene). Separate from this Removal Action Workplan (RAW), the LAUSD decommissioned the former station and removed the USTs under the Los Angeles Fire Department oversight. A RAW was prepared by HartCrowser Inc., dated Jan. 27, 2003, and revised Feb. 14, 2003. The RAW provides the cleanup procedures at the site for the excavation, removal, and offsite disposal of contaminated soils. DTSC approved the RAW for implementation on April 8, 2003. For the purpose of the RAW, the site was divided into five areas (Area 1 through Area 4 plus the former service station).

Description of Significant Differences and the Basis for those Differences:

Area 1: During implementation of the approved Area 1 soil removal, it was determined that the volume of soil containing high levels of lead was significantly greater than had been estimated in the PEA and supplemental investigations due to the discovery of buried construction debris in Area 1. Soil sample results indicated that high lead concentrations were present in the soil intermixed with the construction debris. To address the lead contaminated soil, the construction material and soil were separated, stockpiled, and waste profile samples were collected and analyzed. The contaminated soil was disposed offsite. Confirmation samples were collected in the excavations to confirm the cleanup goals were achieved.

Contaminated soil in Area 1 covered an area approximately 60 feet X 117 feet X 10 feet deep. Approximately 60 cubic yards (90 tons) of non-RCRA hazardous soil were removed and transported offsite for disposal at Chemical Waste Management in Kettleman City.

This is a significant increase in volume from the 3.3 cubic yards projected in the approved RAW. This Explanation of Significant Differences documents the significant change in removal volume of lead contaminated soil due to buried construction debris, which was contaminated with lead. Post demolition confirmation sampling results indicate the removal action goals and objectives were achieved.

Original Remedy

- Excavation and offsite disposal of 3.3 cubic yards of lead impacted soils.

Modified Remedy

- Excavation and offsite disposal of 60 cubic yards of lead impacted soils

Former Service Station

Based on data from the PEA and supplemental investigations, the removal of low levels of petroleum detected in site samples limited due to the small extent of affected area and because site data indicated concentrations did not present a human health risk. However, additional soils contaminated with gasoline-related hydrocarbons (mainly benzene and MtBE) were identified during decommissioning and supplemental investigations. As part of a DTSC approved RAW, additional soil contaminated with gasoline-related hydrocarbons were excavated and disposed offsite as non-hazardous waste at Thermal Remediation Solutions in Azusa. Approximately 1,050 cubic yards of soil was excavated at the base of the former UST excavation.

Original Remedy

- Excavation and offsite disposal of 133 cubic yards of volatile organic compound (benzene) impacted soils.

Modified Remedy

- Excavation and offsite disposal of approximately 1,050 cubic yards of soil.

Support Agency Comments: None applicable.

Affirmation of the Statutory Determination:

Considering the new information that has been developed and the changes that have been made to the selected remedy, DTSC believes that the remedy remains protective of human health and the environment, complies with federal and state requirements that were identified in the RAW as applicable or relevant and appropriate to this remedial action and is cost-effective. In addition, confirmation samples indicate the DTSC approved cleanup goals have been achieved and the revised remedy is permanent.

Public Participation:

A copy of this Explanation of Significant Differences (ESD) will be added to the Administrative Record File, which is available for review at the DTSC, Regional Records Office, 1011 N. Grandview Avenue, Glendale, California 91201.

Contact:

If you have any questions or wish to discuss the project, please contact Ms. Laura Zaremba, DTSC, School Property Evaluation and Cleanup Division, (818) 551-2183. Contacts at the LAUSD are Mr. Thomas Watson (213) 633-8242. *Si desea información en español, comuníquese con Mary Elaine Valenzuela al (213) 633-8216.*